

Lowenstein Sandler LLP

Michael B. Himmel
Partner

1251 Avenue of the Americas
New York, NY 10020
T 646.414.6904
F 973.597.6173
mhimmel@lowenstein.com

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VIA ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Heidi Hong Piao, 15-cr-706 (VSB)

Dear Judge Broderick:

This law firm represents Heidi Hong Piao in the above-referenced matter. We write to request a modification to Ms. Piao's bail conditions.

On November 25, 2015, Ms. Piao was released on, *inter alia*, the following bail condition: \$1,000,000 personal recognizance bond co-signed by three financially responsible persons and secured by \$500,000 cash and property. (Dkt. Entry No. 47.) Since that time, Ms. Piao's bail conditions have been modified on multiple occasions to reduce the restrictions (*e.g.*, removal of electronic bracelet, lifting of curfew). (*See* Dkt. Entry Nos. 139, 196, 329.) Ms. Piao has abided by all bail conditions.

We now request a further modification to the bail conditions: to release the two properties (valued at \$340,000) currently secured as collateral. The \$1,000,000 personal recognizance bond will continue to be secured by \$160,000 cash, which was posted on November 25, 2015, and co-signed by the same three financially responsible persons.

The government (via Assistant U.S. Attorney Daniel Richenthal) and Pretrial Services (via Pretrial Officer Hanna Cottignes) have no objection to the proposed modification. All other bail conditions shall remain in effect.

Respectfully yours,

/s/ Michael B. Himmel

Michael B. Himmel

cc: Daniel Richenthal, Assistant U.S. Attorney (via ECF)
Hanna Cottignes, U.S. Pretrial Services Officer (via Email)